

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
CHICAGO DIVISION**

CRISTINA ORTIZ and
DAVID PAGAN,

Plaintiffs,

CASE NO. 1:22-cv-01047

v.

THE MONEY SOURCE, INC.
and FIRST GUARANTY
MORTGAGE CORPORATION,

Defendants.

_____ /

**THE MONEY SOURCE INC.'S MOTION ON CONSENT FOR SECOND
EXTENSION OF TIME TO RESPOND TO THE COMPLAINT**

Defendant The Money Source Inc. ("TMS"), by and through its counsel, Nelson Mullins Riley & Scarborough LLP, moves for a first extension of time to respond to Plaintiffs' Complaint. In support of this motion, TMS states as follows:

1. Plaintiffs Christina Ortiz and David Pagan filed their Complaint on or about February 28, 2022.
2. The Return of Service filed by Plaintiffs (Dkt. No. 6) states that TMS was served on March 4, 2022.
3. On March 24, 2022, the Court entered an Order granting TMS an extension to and include April 25, 2022 to respond to the Complaint (Dkt. No. 12).
4. Plaintiffs' counsel consents to an additional twenty-eight (28) day extension of time to answer, move or otherwise respond to the Complaint to and including May 23, 2022.
5. This is the second request for an extension of time.

6. A status conference is presently scheduled for May 6, 2022. No other Court deadlines appear on the docket of this matter.

Wherefore, The Money Source Inc. respectfully requests that an order be entered granting TMS an extension of time to and including May 23, 2022 to respond to the Complaint.

Dated: April 20, 2022
Nashville, Tennessee

Respectfully submitted,
NELSON MULLINS RILEY & SCARBOROUGH, LLP

By: /s/ Nathan E. Hoffman
Nathan E. Hoffman

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Attorneys for Defendant The Money Source Inc.

Certificate of Service

I HEREBY CERTIFY that a true and correct copy of the foregoing was electronically filed with the Clerk of the Court using CM/ECF on April 20, 2022. I also certify that the foregoing document is being served this day on the following counsel of record via transmission of Electronic Filing generated by CM/ECF:

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